



December 11, 2009

Professor Larry Goulder
Chair, Economic and Allocation Advisory Committee
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Climate Adaptation in EAAC Draft Report

Dear Professor Goulder and Members of the EAAC:

The National Wildlife Federation and the Planning and Conservation League would like to express our appreciation for the inclusion of climate adaptation in the most recent EAAC draft report (12/9/09). We are particularly pleased to see the committee's recommendation that a "significant share" of allowance value should be devoted to investment in emission reduction, adaptation, and environmental remediation.

We urge the committee to make adaptation funding a high priority so that adequate resources are available to address climate impacts to California's vulnerable wildlife, habitats, and communities. As the committee prepares recommendations regarding the amount of allowance value that should be dedicated to certain uses, we encourage you to consider how well climate adaptation performs under all three of the committee's proposed investment criteria:

Aggregate social net benefits

Early strategic investments to address the current and anticipated impacts of global warming can greatly reduce the risks faced by communities and ecosystems, avoiding more costly interventions in the years ahead. In addition, many adaptation measures provide a wide array of environmental, economic, and social equity co-benefits. For example, by undertaking land purchases and management activities to allow coastal wetlands to migrate upslope, we can buffer nearby communities from the impacts of sea level rise, reduce insurance costs, increase carbon sequestration, protect critical species and habitats, preserve water quality, generate green jobs, and provide new recreational and open spaces.

Fairness

Investing in climate adaptation helps advance fairness and equity in several ways. First, it reinforces the "polluter pays" principle; greenhouse gas emitters will be paying to help address the damage that their emissions are causing to communities and the environment. Second, it supports disadvantaged communities; these populations are often targeted for adaptation support because they lack the capacity to protect themselves from adverse climate impacts such as extreme temperatures, increased air pollution, flood risk, and new disease vectors. Third, it reduces intergenerational inequity; measures to address the effects of today's greenhouse gas emissions will lower the costs born by future generations.

Simplicity

California already has much of the structure needed to implement adaptation measures quickly, simply, and efficiently. The recently-finalized California Climate Adaptation Strategy identifies and prioritizes adaptation measures to be undertaken by national, state, and local stakeholders. State agencies have already begun to implement many of the identified near-term measures. In addition, both the U.S. House and Senate have advanced climate legislation that includes clear, straightforward mechanisms to coordinate adaptation planning and implementation through all levels of government (see H.R. 2454 and S. 1733).

These factors demonstrate the need for a robust investment in climate adaptation as part of California's climate program. We therefore request that the committee recommend that a significant percentage of auction revenue is dedicated to climate adaptation and encourage the committee to strengthen the report's description of adaptation to highlight the issues raised above.

Thank you for your consideration,

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